

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

TEAM SYSTEMS INTERNATIONAL, LLC,¹

Case No. 22-10066 (CTG)

Debtor.

**DEBTOR'S COMBINED WITNESS AND EXHIBIT LIST FOR VIDEO HEARING
SCHEDULED FOR FEBRUARY 9, 2022 AT 1:00 P.M. (ET), BEFORE THE
HONORABLE CRAIG T. GOLDBLATT**

The Debtor, by and through their undersigned counsel, Robinson & Cole LLP, hereby submits its list of exhibits and witnesses for the video hearing scheduled for February 9, 2022 at 1:00 P.M. (ET), not including materials that may be used for impeachment purposes. The Debtor reserves the right to supplement and amend the witness and exhibit list below as necessary up to the date of the Hearing:

UCC Exhibit Number	Description	Beginning Bates Number or Docket No.
1.	Chapter 11 Voluntary Petition (and corresponding attachments)	D.I 1
2.	Schedules / Statements: Statement of Financial Affairs	D.I. 28
3.	Schedules / Statements: Sum of Assets and Liabilities	D.I. 29
4.	Amended Schedules/Statements E-F	D.I. 56
5.	GPDEV, LLC and Simons Exploration, Inc. (the “ <u>Creditors</u> ”) Pre-Trial Brief (and any attachments thereto)	To be filed
6.	Debtor’s Pre-Trial Brief (and any attachments thereto)	To be filed
7.	All pleadings, dockets, exhibits, orders, opinions, transcripts, depositions, or other filed documents related to this chapter 11 case 22-10066, including any attachments thereto.	N/A
8.	Debtor’s Bank Statements from 2018-2022 (that were produced in document production)	Various
9.	DLA Energy Bunkers contract with TSI from Aug 1, 2018	TSI000281

¹ The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor’s service address in this chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

10.	DLA Energy Bunkers contract with TSI from Aug 1, 2018 (attachment)	TSI000282
11.	Invoice 2973 - USS Squall - 19 Nov 2021.pdf	TSI000290
12.	Army Contract Command contract with TSI from Nov. 15, 2017	TSI000291
13.	2021.07.20 CBCA 7145- First Amended Complaint.pdf	TSI000296
14.	HU0001-15-R-0005 (AV MATOC) - Small Business Notification.pdf	TSI000332
15.	TSI LLC - Operating Agreement.pdf	TSI000333
16.	Email from L. Collins dated 1-28-2022.pdf	TSI000412
17.	FEMA - 2021.12.30- Appellant's Opposition to Respondent's Motion for Summary Judgment and Reply ISO Summary Judgment (CBCA 7145).pdf	TSI000413
18.	2022-01-27 - Board's Decision Denying Motions for Summary Judgment.pdf	TSI000435
19.	Invoice 2951 - USS Devastator - 22 Oct 2021.pdf	TSI000443
20.	USS Devastator BDR - 22 Oct 2021.pdf	TSI000444
21.	HU000115DE095 AV MATOC TSI Signed.pdf	TSI000445
22.	USCGC Maui BDR - 19 Nov 2021.pdf	TSI000467
23.	DLA Energy Buckers Contract from Aug 1, 2019	TSI000468
24.	Invoice 2972 - USCGC Maui - 19 Nov 2021.pdf	TSI000469
25.	DLA Energy Bunkers contract with TSI from Aug. 9, 2018	TSI000470
26.	Invoice 2971 - USS Sirocco - 19 Nov 2021.pdf	TSI000471
27.	DLA Aviation Contract with TSI from Aug. 19, 2014.	TSI000476
28.	Lindsay Blee list of invoices with TSI since 7/9/2018 dated 1/24/22.	TSI000478
29.	FEMA Contract with TSI from Jan. 18, 2018.	TSI000479
30.	FEMA Contract Modification with TSI from Feb. 19, 2020.	TSI000480
31.	FEMA Contract Modification regarding releasing containers with TSI from May 7, 2018	TSI000482
32.	FEMA Contract Modification regarding trailers with TSI from Jan 10, 2018.	TSI000483
33.	FEMA Contract Modification regarding Drop Trailers from Apr. 30, 2018.	TSI000484
34.	FEMA Contract Modification regarding decrease in liters of water from Nov. 6, 2017.	TSI000485
35.	FEMA Contract Modification regarding containers dated April 5, 2018.	TSI000488
36.	FEMA Contract Modification regarding detention charges May 3, 2019.	TSI000489
37.	FEMA Contract Modification regarding detention charges from Apr. 12, 2018.	TSI000491
38.	FEMA Task Order regarding water bottles for Hurricane Maria from Sept. 28, 2017 (requesting 80M bottles).	TSI000493

39.	FEMA - 2021.10.28 - Appellant's Motion for Summary Judgment (CBCA 7145).pdf	TSI000515
40.	USS Squall BDR - 19 Nov 2021.pdf	TSI000536
41.	MATOC AWARD.pdf	TSI000540
42.	2021.07.08 CBCA 7145- Complaint.pdf	TSI000573
43.	DLA Aviation Contract with TSI from June 18, 2014.	TSI000614
44.	Attachment: DLA Aviation Contract with TSA from June 18, 2014.	TSI000633
45.	Ex 20 - Mott E-mails re TSI Claim against FEMA.pdf	TSI000664
46.	Ex 21 - COFD - TSI Claim for Restocking Fee - April 30 2021.pdf	TSI000668
47.	Attachment spreadsheet to FEMA response re Restocking Fee. (pg. 1 of 3)	TSI000682
48.	Attachment spreadsheet to FEMA response re Restocking Fee. (pg. 2 of 3)	TSI000683
49.	Attachment spreadsheet to FEMA response re Restocking Fee. (pg. 3 of 3)	TSI000684
50.	Ex 25 - Florence Task Order and Email (Fully Executed).pdf	TSI000685
51.	USS Sirocco BDR - 19 Nov 2021.pdf	TSI000702
52.	FEMA Contract Modification with TSI	TSI000703
53.	FEMA Contract Modification with TSI	TSI000716
54.	FEMA Contract Modification with TSI	TSI000762
55.	FEMA Contract Modification with TSI	TSI000764
56.	FEMA Contract Modification with TSI	TSI000770
57.	FEMA Contract Modification with TSI	TSI000776
58.	FEMA Contract Modification with TSI	TSI000778
59.	FEMA Contract Modification with TSI	TSI000784
60.	FEMA Contract Modification with TSI	TSI000786
61.	BBVA_Summary_Master (TSI).pdf	TSI000845
62.	E-mails between S. Acosta and DLA re submission of Critical Technical Data Agreement and discussion regarding additional steps for certification.	TSI000971
63.	SEACARD_Award_08_04_2021.pdf	TSI001005
64.	FW SEA Card OMSQuote Window Closing - Quote Request ID 11811 For Vessel USS Milwaukee.msg	TSI001007
65.	Letter granting Steven M. Acosta allowance as a facility security officer of TSI.	TSI001008
66.	Costa Rica Puerto Golfito Award.pdf	TSI001030
67.	FW_ Case# 00064769 - TSI SEA Card Merchant Account 28931 is Active.pdf	TSI001033

68.	Countersigned Agreement for TSI Executed SeaCard Merchant Agreement from May 2018..pdf	TSI001038
69.	Corporate Document naming Steve Acosta as Member on Jan. 2, 2018	TSI001040
70.	E-mail form <Robert.Wink@bep.gov> on Feb. 4, 2022 requesting a quote for 10,000 Gallons of Red Dyed diesel fuel.	TSI001041
71.	FW SEA Card OMS Quote Request Modified - Quote Request ID 11868 For Vessel USNS Mendonca.msg	TSI001042
72.	E-mail from Sea Card with New Contract Order: US Navy request for Commercial Marine Gas Oil from February 6, 2022	TSI001043
73.	All documents and communications filed on any other party-in-interest's (including the Creditors) exhibit list in connection with the Hearing.	N/A
74.	Any document, solely for the purposes of rebuttal or impeachment	N/A

Witnesses

1. Deborah Mott. Ms. Mott is a member of Team Systems International, LLC. Ms. Mott will testify concerning the Debtor's assets and liabilities (including contingent and disputed) as well as its past and ongoing business operations. Ms. Mott will testify concerning the Debtor's finances and decision to file this chapter 11 case. Ms. Mott will also testify in rebuttal to any claims advanced by Creditors at the hearing. The witness's location will be provided prior to the hearing.
2. All witnesses listed on any other party-in-interest's witness list or called by another party in interest in connection with the hearing.
3. The Debtor reserves the right to call any witness solely for purposes of rebuttal.

Dated: February 7, 2022
Wilmington, Delaware

ROBINSON & COLE LLP

/s/ Jamie L. Edmonson

Jamie L. Edmonson (No. 4247)

Curtis J. Crowther (No. 3238)

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